

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
*Executive Director
and Attorney-in-Chief*

Application granted. Defendants' bail conditions are modified such that they are permitted to travel to Virginia on April 30, 2023 and return on May 14, 2023. The Clerk of Court is respectfully requested to docket this order in No. 23-cr-211.

*District of New York
Jennifer L. Brown
Attorney-in-Charge*

VIA ECF & EMAIL

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 28, 2023

Re: *United States v. Errol Alveranga & Dona Taylor-Alveranga, 22-mj-3841-1, 2*

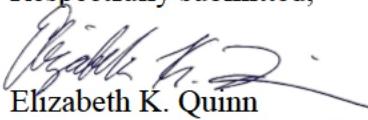
Dear Honorable Judge Krause:

I write to respectfully request that my client, Dona Taylor-Alveranga, and her husband and co-defendant, Errol Alveranga, release conditions be modified to permit them to travel as outlined below. Mr. Alveranga's counsel, James Neuman joins in this request.

Ms. Taylor-Alveranga and Mr. Alveranga made their initial appearance on May 11, 2022, before the Honorable Andrew E. Krause and were released on conditions. They have been compliant with their conditions since their release. They made their initial appearance before Your Honor on April 19, 2023. Ms. Taylor-Alveranga's 92-year-old mother is expected to have surgery on Monday, May 1, 2023, in Gainesville, Virginia. The couple was hoping to visit with her and care for her after the procedure. If approved, they would travel to Virginia on Sunday, April 30, 2023, and return on Sunday, May 14, 2023. The couple previously made a request to travel to care for Ms. Taylor-Alvaranga's mother following a different procedure on May 30, 2023, which was granted.

I have contacted the Government, through Assistant United States Attorney Steven Kochevar, who has no objection to this request. Ms. Taylor-Alveranga and Mr. Alveranga's Pre-trial Officer, Shannon Finneran, also has no objection to this request. If this request is granted, Therefore, the Alverangas request permission to travel as outlined. Thank you for your time and consideration of this matter.

Respectfully submitted,


Elizabeth K. Quinn
Assistant Federal Defender

cc: Steven Kochevar, AUSA
Shannon Finneran, PTO
James Neuman, Counsel for Errol Alveranga